

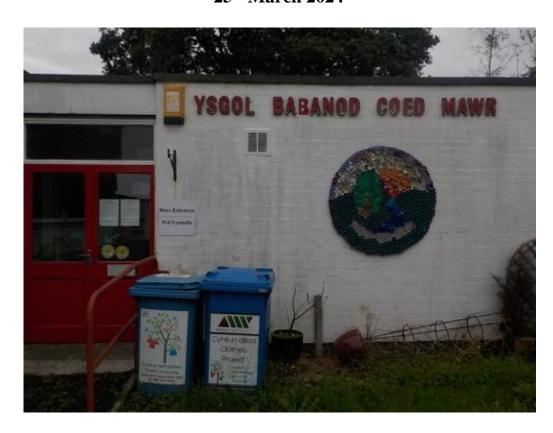
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Ysgol Coed Mawr, Bangor Ecological Survey Updated Report

25th March 2024



Report by: Kate Williamson, CIEEM & Ben Box

Client: Gwynedd Council, c/o Rhys Carden, Building Development Officer, Property

Development Unit

Planning

Authority: Gwynedd Council, (GC)

Grid

Reference: SH 56633 70767

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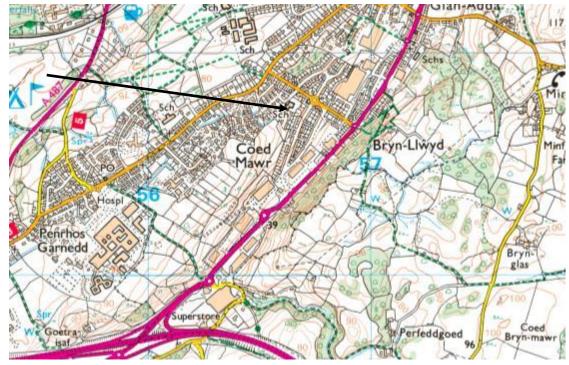


Fig.1: Site location

Ecological Survey Report Ysgol Coed Mawr 1 Bron y De Bangor LL57 4TN

Updated 19th May 2022

1 Summary

An initial site walkover survey and building assessment was carried out at Ysgol Coed Mawr on 10th September 2020 by Cambrian Ecology Ltd. It is proposed to demolish the existing school building, which has now closed down and develop the site for housing.

This survey involved methodically searching for signs of bats and other protected species, in particular nesting birds associated with the buildings and the surrounding habitats. The buildings were also assessed on their potential to support bats or any other protected species.

The habitats on the current site consisted of heavily managed amenity grassland and hard standing, with small areas of ornamental planting. None of these habitats has any conservation value, although there can be protected species issues associated with them.

Due to the fact that no signs of bats or other protected species were recorded during the building assessment and only minimal roosting potential noted on the buildings, a single bat emergence survey was then carried out on the same evening.

This emergence survey was also negative, and it was concluded that there was minimal potential for bats to be present at any time of the year. No mitigation is therefore required with regard to bats.

There is the potential for nesting birds to be present within some of the ornamental planting which will require removal. Any disturbance during the nesting season resulting in the failure of the brood would constitute an illegal activity.

There was evidence of invasive non-native species (INNS) within the grounds in the form of Montbretia; (*Crocosmia crocosmiflora*) and Rockspray cotoneaster; (*Cotoneaster horizontalis*). Both these species are listed under the Wildlife & Countryside Act and there are legal implications with regards to causing, or allowing their spread into the wild.

A secondary site visit was carried out on the 6th May 2022 following the demolition of the building and initial ground-works. This survey confirmed that no material containing fragments of INNS had been removed from the site and that remaining stands of Montbretia are in areas which will be unaffected by the works.

Under Chapter 6 of Planning Policy Wales 10, planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. In this case, it is recommended that house sparrow; (*Passer domesticus*) colony boxes, swift; (*Apus apus*) bricks and bee bricks are included in the fabric of the new development.

Key Messages:

- There are no bat issues associated with the proposed demolition works, therefore no further survey work or mitigation is required
- Montbretia and Rockspray cotoneaster, listed as INNS are present on the site and will be required to be taken into consideration to prevent the spread of these species off-site, see Section 9.1
- A secondary site visit in May 2022 confirmed that no INNS had been spread
 off site and that remaining plants are in areas which will not be impacted
 by the works.
- There is the potential for nesting birds to be present at the appropriate time of year which will require the sensitive timing of works, see Section 9.2
- Biodiversity enhancement works are recommended in the form of bird nesting boxes and bee bricks in the fabric of the new building see Section 9.4

2 Introduction

Cambrian Ecology Ltd was commissioned by Rhys Carden of Gwynedd Council's Property Development Unit to carry out an ecological survey of buildings and grounds at Ysgol Coed Mawr in Bangor. It is proposed to demolish existing redundant school buildings and redevelop the site for housing.

A bat and protected species survey is required by Gwynedd Council to accompany the necessary planning application for the works.

Ysgol Coed Mawr is located at Grid Reference SH 56633 70767.

3 Methodologies

3.1 Habitat

The walkover habitat survey of the school grounds was carried out on 10th September 2020 by ecologists Chris Hall ACIEEM and Kate Williamson CIEEM. The survey identified baseline ecological conditions, as well as any important or notable habitats. All habitats within the proposed development site were classified, using target notes to identify features of particular ecological interest. Species lists were drawn up for each habitat type identified and the habitat condition was assessed. In the context of this report, *important or notable habitats* are considered to be those which are of a sustainable size and which meet any of the following criteria:

- Habitats which have a high intrinsic ecological value, i.e. they support a diverse range of vascular plant and/or faunal species;
- Mature or semi-natural habitats in built-up areas;
- Any UK priority habitats;
- Local priority habitats considered having a significant extent and/or ecological interest.

All habitats considered to have the potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species. Where possible, habitats were cross-referenced to any relevant UK priority habitats or local habitats adopted by Gwynedd Council's Biodiversity Action Plan, 'Natur Gwynedd'.

3.2 Buildings

The buildings survey was carried out on 10th September 2020 by licensed bat workers Kate Williamson, (S085358/1) and Chris Hall (S085724-1). Kate has been working as an independent ecologist for 10 years and has held a bat license from the Countryside Council for Wales (now NRW) since October 2004. Kate is also a full member of the Chartered Institute of Ecology & Environmental Management (CIEEM). Chris has been working as an independent ecologist for 16 years and has held a bat license since 1996. Chris is also an Associate Member of CIEEM.

An emergence survey was then carried out the same evening with a total of 5 surveyors to ensure effective coverage of the buildings. The assistants have all had experience of bat surveys with CEL since at least 2019.

Objectives of the bat surveys at Ysgol Coed Mawr were:

- Identify any signs of the presence of bat species within the buildings
- Assess the potential of the buildings to support bat species
- Identify any crevice-dwelling species roosting within internal or external features of the buildings and identify the features they are using
- Assess the levels of potential disturbance and loss of roosting opportunities due to the proposed works

- Establish the status of any roosts present
- Recommend mitigation and compensation measures to ensure the continued ecological functionality of the site for bats
- Identify any other protected species issues associated with the proposals
- Identify any bio-security issues associated with the proposals, including the presence of any non-native species

During the buildings survey, all crevices and other likely roosting areas were methodically searched for signs of bat occupation, such as droppings, feeding remains and marks on timbers from oils in the animal's fur. A Voltcraft BS-10 USB endoscope was available to investigate any accessible roosting areas on the exterior of the building. High powered lights, including Cluson Clulite Clubman CB2 and LED Lenser torches were used to examine exterior features and search for signs of bat occupation.

The emergence survey commenced half an hour prior to sunset and continued for at least 90 minutes after sunset to allow for the potential presence of late emerging species such as long eared bats; (*Plecotus auritus*).

Anabat SD1 and SD2 units were used to pick up the echo-location calls of any emerging bats, the identity of which was then confirmed using computer analysis of recordings .A FLIR E40bx thermal imaging camera was used once it became too dark to see emerging bats.

Weather conditions were appropriate for the emergence survey, see table below.

	10 th September 2020
Dusk temperature °C	14,8
Cloud cover %	100%
Wind	Slight breeze
Rain	None
Sunset time	19.43

3.3 Secondary Site Visit

A second site visit was carried out on the 6th May 2022 by ecologist Lizzie Richardson QCIEEM. This visit was requested by the client as a precautionary measure to ensure that the removal of the INNS on site had been carried out correctly. An assessment was also made of the presence of any remaining INNS and recommendations provided for future management.

4. Site Description

4.1 Ysgol Coed Mawr buildings

The current school buildings are all brick-built, flat-roof structures, with no crevices in the brickwork. There is a central section, with a high ceiling above the school hall, which has slate cladding on the upper half of the exterior. The flat roofs are heavy duty roofing felt, with lead flashing around the top of the wall. There are a few gaps where it is bagging away from the walls, but no other crevices.

There are no roof voids.

Street lighting illuminates the front elevations, with security lighting inhibiting any bat potential on the rear.

Roosting potential – low

4.2 Habitat

The only habitats within the current school site boundary are the buildings and hard standing, which comprises the footprint of the current buildings and associated parking areas, along with the heavily managed amenity grassland used as the school's playing fields and occasional small patches of ornamental planting.

Hard standing

There are no species associated with these areas and no biological interest.

Amenity grassland

Species here are indicative of intensive management and include: white clover; (*Trifolium repens*), daisy; (*Bellis perennis*), ribwort plantain; (*Plantago lanceolata*), dandelion; (*Taraxacum officinale*) and perennial rye grass; (*Lolium perenne*). There are no species of conservation concern.

Ornamental planting

These areas include the Montbretia and Rockspray cotoneaster. The small patch of Montbretia was located underneath a mature birch tree, while the cotoneaster was against the southern section of the building, see Fig.3 below. The birch tree had no cracks or crevices that could support roosting bats.



Fig.2: Aerial photo of habitat surrounding Ysgol CoedMawr

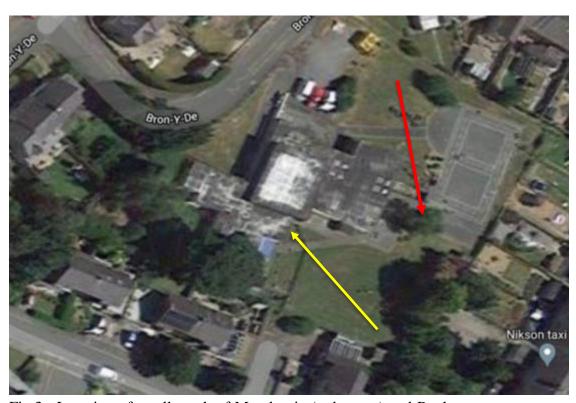


Fig.3: Location of small patch of Montbretia (red arrow) and Rockspray cotoneaster (yellow arrow)

5 Results

5.1 <u>Bats</u>

Building Survey

No sign of current use by bats was found during the survey.

Emergence Survey

The emergence survey was negative.

Only occasional passes of common pipistrelle bats were recorded, largely along the eastern boundary where there is a mature hedgerow in a neighbouring garden. None of these animals were associated with the buildings being surveyed.

5.2 Other Protected Species

There is no evidence of nesting birds associated with the proposed works to the buildings. However, some of the ornamental planting has the potential to support nesting common species during the recognised breeding season.

6 Survey Limitations

Bats are highly mobile animals and some species move roosts on a regular basis. It is often possible to find signs of bat occupation outside of the time that they are resident, in the form of droppings and feeding remains, however, these dissipate over a period ranging from a few days to several months. Many species are crevice-dwelling and signs may be impossible to find. An accurate assessment of the potential of a building to support bats is therefore important to establish the need for further survey work. In this case, all the buildings were assessed as having minimal potential for roosting bats at any time of year.

While the current guidance for professional bat surveys is usually to carry out a suite of three seasonal surveys, in this particular case it is felt that a single survey is proportional due to the minimal potential of the affected buildings and surrounding habitat to support bats. It is considered that the expense and survey effort required to identify the roosts of individual, very mobile species is disproportionate to the risk involved in this particular case. All the survey objectives have been reasonably achieved.

- It has been established that there are currently no bats associated with the buildings surveyed
- The potential of these buildings to support roosting bats at any time of the year is considered low to minimal
- There will be no disturbance to or negative impact on bat species due to the proposed works, therefore no mitigation or further survey work is required

• There are no other protected species or non-native invasive species issues associated with the buildings

Field signs for protected and important species are often difficult to find or absent from a site. For this reason, the site and its habitats are assessed on their potential to support these species.

7 Ecological Impacts

7.1 Habitats

There are no other protected species associated with the buildings and hard standing areas and therefore, no impacts due to the proposed works.

The managed amenity grassland on the site that is to be lost due to the proposed works is of low botanical interest. It is not considered that this will represent any significant loss of biodiversity.

The ornamental species present on this site are of minimal benefit to Biodiversity with regards to the production of nectar, fruit etc. and their benefit is largely as cover for nesting birds which will be required to be taken into consideration.

7.2 Bats

Due to the negative results of the surveys of the buildings, combined with the limited potential for bats to be present, no ecological impact on bats is anticipated due to these works.

The mature hedgerow and trees in the neighbouring property on the eastern boundary will not be affected by the proposed development and the habitat is currently very open and well illuminated. It is not considered that the proposed development of the Ysgol Coed Mawr site will result in the habitat becoming less favourable to foraging bats than it already is.

The single mature birch tree on the site has no features that offer any bat roosting potential.

7.3 INNS

One concern is the presence of Montbretia and Rockspray cotoneaster as these species are classed as an INNS under the Wildlife & Countryside Act. While it is not illegal to grow species such as these in a garden situation, it is illegal to cause, or allow these species to spread into the wild. In this case there is the potential for the species to be

spread off-site during ground works and construction phases. However, the cotoneaster is relatively easy to 'control' and the Montbretia is currently restricted to a very small area. If the recommendations below are adopted, it will prevent any potential negative impacts.

7.4 Nesting birds

There are potential negative impacts for nesting birds during the clearance phase of the works within ornamental planting.

8 Conclusions

8.1 Habitats

The amenity grassland, ornamental planting, buildings and hard standing areas have no significant botanical interest and negligible potential to support protected species. There is not considered to be any impacts associated with the proposed works in these areas.

A single birch tree will be lost during the site clearance. Whilst it is particularly difficult to mitigate for the loss of mature trees due to the timescales involved in their replacement, in the longer term the inclusion of native trees of benefit to wildlife, in addition to other wildlife-friendly garden species, within the landscaping scheme will provide an enhancement for Biodiversity.

8.2 <u>Bats</u>

It is concluded that there are currently no bat roosts within any section of the buildings at Ysgol CoedMawr and only minimal potential for any to be present at any time of the year. This is primarily due to the lack of potential roosting features on the buildings and the high levels of lighting surrounding the site. There are also no potential roosting features identified within the birch tree on the site.

There is however always the potential for any building, even with minimal potential to become occupied as bats are very mobile animals that can move roost on a regular basis. In this particular case the survey effort and expense of locating the roosts of individual mobile animals are considered disproportionate to the risk involved. Some simple precautionary measures will be required to cater for the minor potential for bats to be present.

8.3 INNS

The proposed works offer an opportunity to control two invasive plant species; *C. horizontalis* and Montbretia, whilst they are limited in extent. Only individual specimens of both species were recorded so there is a very real chance of eradication on the site with relatively little effort.

Conclusions of Second Site Visit

The second site visit on 6th May 2022 confirmed that the two INNS had been removed from the locations identified in the original survey as per the recommendations provided in the original report. Consultation with the client on site revealed that this process had been carried out correctly and no materials had been removed from site which could cause the spread of either plant, and no future material will be removed which could potentially contain remnants of either species.

The second survey did identify one new stand of Montbretia in the North-West corner of the site, which was identified to the client.

It is understood that the remaining stand of Montbretia is located within an area of the site which will not be directly impacted by the works. However, due to the rapid spread of this species it is recommended that this and any future stands of Montbretia are eradicated using the 'Containment Strategy' provided, see Section 9.1.

8.4 Nesting birds

The proposed loss of the ornamental planting areas around the school grounds has the potential to disturb birds if carried out during the nesting season. Measures will need to be taken to ensure no active nests are impacted, see below. However, the habitat loss is small in the wider context is not considered significant and there are opportunities within the development to enhance ornamental planting to be of wider benefit to wildlife, which will negate any negative impacts in the long term.

9 Mitigation & Recommendations

9.1 Montbretia

There is the potential for the spread of Montbretia, particularly during initial ground-works phase, when there will be excavations for footings, services etc.

Montbretia rarely produces seed and the usual transmission vector is human activity moving the corms around during excavations etc. The corms are very persistent in the soil and this must be taken into account to avoid the risk of committing an offence.

The timescale of the project is not known but there are two potential approaches to the Biosecurity risk posed by the presence of Montbretia. This could either take the form of pre-works eradication treatment if time allows, or a 'containment strategy' to allow the development to commence prior to eradication taking place.

Option 1: Pre-Works Eradication

It is recommended that the Montbretia on the site is treated with an appropriate herbicide prior to demolition or ground-works commencing, both of which could result in the dispersal of the plant.

This treatment must be carried out between March and the end of May when the plant is actively growing but before it starts flowering in early June for the treatment to be effective. A 'systemic' herbicide such as *Glyphosate* must be used to ensure that the roots are killed, not just the foliage. The disadvantage of this approach is that further treatments may be required in subsequent years as on occasions, corms may have become detached from the parent plant which prevents the translocation of the herbicide.

Option 2: Containment Strategy

If the works programme does not allow sufficient time for a pre-works eradication to be carried out, there is the option of containing the problem to prevent corms being dispersed in either demolition material of in soil etc during the ground works phase.

For this to be effective, the plant must be excavated to a depth of a minimum of 75cm and a minimum of a 75cm radius from the plant to ensure that all corms have been removed.

This material must then be deposited in an area of the site where it will be unaffected by the proposed works.

This area must be clearly defined and an exclusion zone set up and enforced. The legal implications of allowing, or causing the plant to spread must be covered in any site inductions.

Once the plant has been contained, a decision can be made regarding whether or not to initiate an eradication programme as it is not illegal to grow the plant in a garden situation. It is however recommended that it is eradicated as the plant can easily spread beyond garden boundaries.

9.2 Site Clearance Phase

There are no recommendations with regard to the amenity grassland, buildings and hard standing areas within the development area.

The timing of the vegetation clearance and felling of the birch tree must be undertaken outside of the period 1stMarch to 31st August. This will avoid the potential for any inadvertent breach in the legislation pertaining to nesting birds. If this is not possible within work schedules, then a search of the site by an experienced ecologist will be undertaken immediately prior to the works commencing. In the event of any active nests being identified, clearance in these areas will need to be postponed until such time as the ecologist confirms that all chicks have fledged.

Prior to the clearance works, the site ecologist will identify and point out to the contractors the individual Rockspray cotoneaster plants on the site. These will then be dug up and removed prior to the site clearance phase commencing and disposed of in an appropriate manner.

9.3 <u>Construction Phase</u>

If bats, or evidence of bats is found during the course of the renovation/conversion, work must stop and Natural Resources Wales, (NRW) must be contact with regards how to proceed as there may be a requirement for a licence to complete the works. It is however considered highly unlikely that this will occur.

9.4 Enhancement Measures

Under Chapter 6 of Planning Policy Wales 10, planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This policy addresses the Section 6 Duty of the Environment (Wales) Act 2016 and results in the likelihood of planning applications being refused unless they can show a positive impact on biodiversity.

The location of all biodiversity enhancements must be clearly shown on final plans for the development.

In this case, it is recommended that house sparrow; (*Passer domesticus*) colony boxes, swift; (*Apus apus*) bricks and bee bricks are included in the fabric of the new development. While the initial survey report recommended the use of bat tubes as an enhancement, it is now considered that, due to the location of the site and the lack of general bat activity during the bat emergence surveys, this approach would not be appropriate.



Fig. 4: The layout of the proposed development with each dwelling labelled to facilitate the biodiversity enhancement plan given below.

House Sparrow Colony Boxes

It is recommended that a total of five house sparrow colony boxes are erected as high as possible on the north facing elevations of buildings 1-5 (see Figure 4). This elevation is chosen in order to prevent overheating in the summer and to protect the boxes from prevailing weather. It is recommended that 'Woodcrete' or 'Woodstone' products such as the 1SP Schwegler Sparrow Terrace are used due to these materials favourable longevity and insulative properties.



Fig. 5: An example of an appropriate house sparrow terrace box

Swift Bricks

It is recommended that a total of eight swift bricks are included in the fabric of the works. These should be installed as high as possible with two on each of the west facing gable ends of houses 1 and 6 and two on each of the east facing gable ends of houses 5 and 10 (see Figure 4). These locations have been chosen due the necessity of such features to be as high as possible off the ground and have at least 5m clearance in front

of their entrances. It is recommended that integrated products such as the Pro UK Visible Build-In Swift Box are used as these products are discrete and are unlikely to be removed by feature residents.



Fig. 6: An example of an appropriate swift brick product

Bee Brick

It is recommended that a total of 20 bee bricks are installed in the fabric of the new building. These bricks should be installed as high as possible with two on the southern elevation of each dwelling. As with the swift bricks, these features should be integrated into the building to prevent future interference.

These products only attract solitary bees and do not therefore cause any problems to the householder. Solitary bees have no queen or honey to protect and as a result are non-aggressive and won't sting.



Fig. 7: Examples of appropriate bee brick products.

New Planting

It is recommended that species of benefit to wildlife are used in in any new planting scheme. The following species are recommended as they are of benefit to Biodiversity.

- *Berberis darwinii* grows successfully on coastal sites and while the Berberis family does produce berries, they are primarily useful as spring nectar source.
- *Eleagnus*: either *umbellata* or *parvifolia*. Both cultivars are a valuable nectar source in the spring and produce berries in autumn.
- *Escallonia*: There are numerous cultivars and varieties of this species which is tolerant of coastal conditions and provides a profusion of flowers in the summer. Escallonia can also be clipped into a hedge if the design is formal in nature.
- *Hebes* are a very useful plant for coastal areas and due to the vast variation in growth habit, leaf colour and flowering periods, an appropriate Hebe can be found that can incorporated into most garden designs.
- *Lavandula*: The lavender family is extremely useful in coastal regions and the flowers are particularly appealing to bees.
- Olearia: The Olearias are also a plant tolerant of coastal conditions O. *Macrodonata* would be particularly successful and produces a profusion of fragrant flowers in June.
- Some of the butterfly bush; (*Buddleia*) family are definitely worthy of consideration as they thrive on light, sandy soils. The careful selection of the correct cultivar is however very important. See 'Plants to Avoid' below.

Plants to avoid

There are many sources of information regarding planting schemes to enhance biodiversity. Care must however be taken when selecting species and sufficient research carried out to ensure that introduced species do not cause long-term problems.

The *Cotoneaster* genus is a prime example. Almost all of this species produce a profusion of flowers in spring which attract an equally profuse quantity of pollinating insects, particularly bees. The plant then produces a large crop of berries, which are eaten by birds and most 'wildlife gardening' sources heartily recommend the planting of *Cotoneasters*. The problem however lies with this attractiveness of the berries to birds. There is no way of controlling the spread of *Cotoneaster* into the wild via seeds deposited in bird's droppings. This spread can be over vast distances.

As a result, five *Cotoneasters* are listed as INNS under the Wildlife & Countryside Act. While it is not illegal to grow these plants in a garden situation, it is recommended that they are avoided due to this lack of control over the spread of the species into the wild. The five to avoid are *C. horizontalis*, *C. simonsii*, *C. integrifolius*, *C. bullatus* & *C. microphyllus*.

Provided that these five are avoided, the planting of this species can be very beneficial to biodiversity in a garden situation.

The planting of *Buddleia* is also widely recommended in many sources. Again care should be taken with regards to cultivar/species selection. While not listed as 'invasive' it is recommended that the planting of *B. davidii* is avoided. There are however some *Buddleias* worthy of consideration. Their common name of 'butterfly bush' is deserved and *B. x weyeriana* is a hybrid that is worth consideration along with *B. fallowiana alba*.

10 Legal Implications

10.1 Bats

Bats are protected under UK law by the Wildlife and Countryside Act 1981 (as amended) and also under European law by the Habitat and Species Regulations 2010. Under these laws it is an offence to deliberately kill or injure a bat, to disturb a bat or to damage, destroy or block access to a roost. Bat roosts are protected under these laws whether the animals are present at the time of survey or not. NRW are empowered to issue licences to carry out work to bat roosts for reasons of overriding public interest. Failure to obtain a licence to carry out works on a bat roost could result in a criminal offence being committed.

10.2 INNS

C. horizontalis and Montbretia are included in the list on Schedule 9 of alien invasive species covered by the Wildlife & Countryside Act 1981. Under this legislation, the introduction of any of the species listed, or allowing them to spread into the wild could constitute an offence.

The Environmental Protection Act 1990 and associated regulations define INNS contaminated soil or plant material as controlled waste and make provisions for their treatment and disposal.

10.3 Nesting Birds

Under the Wildlife and Countryside Act 1981, all nesting birds and their nests are protected. Once a bird places a single piece of material then it constitutes a nest. It is then an offence to cause damage to the bird, nest, eggs or chicks and immediate habitat which is likely to result in damage by causing the bird to desert its nest. This covers all bird species, with a small number of exceptions (pest species which can be controlled by special license.

In 2000, the Countryside and Rights of Way Act (CROW Act) was made law, strengthening the legal protection for many species and introducing a 'reckless disturbance' offence.

Planning Authorities are also obliged to take nesting birds into account in relation to planning decisions following guidance from the Welsh Government detailed in Technical Advice Note (TAN) 5.

11 Appendices

11.1 Photographic Record



Flat roof sections of the school buildings



Higher section of the school hall



Hard standing playground and amenity grassland area



Single birch tree, with Montbretia present beneath it



Rockspray cotoneaster



Small patch of Montbretia (orange flowers)

11.2

Report Reference							
Williamson, K. 2020. Ecological survey report for Ysgol Coed Mawr, Bangor. Unpublished Report							
Date sent to Cofnod17/9/2020							
Date	Location	Grid Reference	Species	Nature of record	Recorder		
10.09.2020	Ysgol Coed Mawr	SH 566 707	Cotoneaster horizontalis	Sighting	Chris Hall		
10.09.2020	Ysgol Coed Mawr	SH 566 707	Montbretia	Sighting	Chris Hall		

11.3 Review Table

Name	Task	Date
Kate Williamson	Author	16.09.2020
Chris Hall	Review	17.09.2020
Natalie Parry	Proof Reading	18.09.2020
Lizzie Richardson	Author Updated Report	19.05.2022

Chris Hall	Review	19.05.2022
Ben Box	Amended to reflect GIS	25.03.2024